

United States District Court	DISTRICT of ARIZONA
United States of America v. Shawn Allen Cobb DOB: 1996; United States	DOCKET NO. SEALED
MAGISTRATE'S CASE NO. 20-04406 MJ	

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about February 7, 2020, in the District of Arizona, **Shawn Allen Cobb**, knowing and in reckless disregard of the fact that certain illegal alien, namely FGF, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).**

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about February 7, 2020, in the District of Arizona (Sonoita), United States Border Patrol Agents (BPA) encountered a 2008 Dodge Avenger at the HWY-82 checkpoint with one visible occupant. The driver was identified as **Shawn Allen Cobb**. The vehicle was referred to secondary inspection where a service dog alerted to the trunk of the car. A concerned citizen who was driving behind Cobb told the BPA that Cobb pull out from a dirt road two miles south of the checkpoint. He added that Cobb pulled out and cut him off, where the citizen had to slam on his brakes and swerve to avoid a traffic collision. BPA found an unaccompanied juvenile hiding in the trunk and determined that he was in the U.S. illegally. The trunk was packed with trash and the juvenile's ability to move in the trunk was very limited.

Material witness FGF said that he was traveling to New York to live with his uncle and work. FGF said that his uncle was going to give the driver money after picking him up. FGF identified **Cobb** as the driver.

In a post-*Miranda* statement, **Cobb** said that he responded to a message notification offering to pay \$300 USD to transport people from the Arizona border to Phoenix, AZ. He said that he knew that he would be transporting illegal aliens. **Cobb** said that he drove to Douglas and arrived at a store where he picked up the illegal alien. **Cobb** initially said that he stopped before the checkpoint to place the illegal alien in the trunk. Later he said that the illegal alien got into the trunk when he picked him up and that he had been in the trunk for approximately three hours when they were arrested. **Cobb** admitted that he transported another illegal alien in the trunk of his car the previous day and that he took him to Phoenix.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: FGF

Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT 
AUTHORIZED BY: AUSA KCH/ri <u>KCH</u>	OFFICIAL TITLE Border Patrol Agent

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE ¹⁾	DATE February 10, 2020
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¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54 CC: AUSA, N. Walters; CSA, P. Kimble